

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

DR. DAVID BRUCE ALLEN

PLAINTIFF

VERSUS

1:12cv57HSO-RHW

JACKSON COUNTY, MISSISSIPPI
By and through its Board of Supervisors;
JACKSON COUNTY SHERIFF
DEPARTMENT, SHERIFF
MIKE BYRD, officially and in his individual
Capacity; JACKSON COUNTY NARCOTICS TASK FORCE
AND OTHER UNKNOWN JOHN AND JANE DOES A-Z,
Also in their official and individual capacities

DEFENDANTS

COMPLAINT

THE PLAINTIFF DEMANDS A TRIAL BY JURY AND
WILL AMEND THIS COMPLAINT

COMES NOW, the Plaintiff, DR. DAVID BRUCE ALLEN, in the above styled and numbered civil action, by and through his counsel of record, MICHAEL W. CROSBY, who files this his Complaint against the aforementioned Defendants, both known and unknown at this time. In support of this civil action, the Plaintiff states, avers and gives notice of the following:

PRELIMINARY STATEMENT AND FACTS

This is a Federal Civil Rights action brought as a result of what the Plaintiff believes was a blatant violation of, inter alia, the federal civil, constitutional and human rights of the Plaintiff, Dr. David Bruce Allen, on or about February 22, 2009, the Defendants abused and violated the

Plaintiff civil rights in manner and method in which they raided his house, subsequently arrested him, and arrested him again. As a direct and proximate consequence of the action of the Defendants the Plaintiff suffered damages. Furthermore, as a direct and proximate consequence of the Defendant's actions, the Plaintiff's rights under certain rights under the Constitutions of the United States of America and the State of Mississippi were violated. Therefore, the Plaintiff DR. DAVID BRUCE ALLEN, files this action and prays for the relief set forth in the following paragraphs.


PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, the Plaintiff, DR. DAVID BRUCE ALLEN, prays that upon the filing of his complaint this Honorable Court would advance this case on the trial docket and order an immediate hearing on the Plaintiff's request for injunctive relief and thereafter set this matter for a full and complete trial on the merits and upon the completion of the same enter a judgment granting the following relief:

- a. Enter a Judgment in favor of the Plaintiff and against the Defendants, jointly and severally, for the actual and compensatory and presumed damages sustained by the Plaintiff, and a Judgment in favor of the Plaintiff and against the Defendants, joint and severally, for punitive or exemplary damages, for the outrageous, willful, wanton and intentional conduct that resulted in a gross or reckless disregard for the welfare, safety, rights, privileges or immunities of the Plaintiff in an amount to be determined by the jury but not less than \$50,000,000.00.
- b. A judgment for such other relief, general or specific, as the Court may deem appropriate, just and equitable in the premises.

RESPECTFULLY SUBMITTED, this the 22nd day of February, 2012.

DR. DAVID BRUCE ALLEN, PLAINTIFF



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